

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

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LITIGATION

This Document Relates To:

ALL ACTIONS

Civil No. 18-cv-1776 (JRT/HB)

JOINT UPDATE LETTER

Dear Judge Bowbeer:

Pursuant to the proposed order submitted at ECF No. 615, Plaintiffs and Defendant Triumph Inc., (“Triumph”) hereby provide the following joint update regarding the status of their ongoing negotiations regarding document search methodology and search terms. The Parties have had a number of substantive discussions regarding the search terms that will be used by Triumph. The Parties have made significant progress, but a small number of current disputes still remain. Plaintiffs and Triumph have not yet exhausted the meet-and-confer process; and Plaintiffs and Triumph believe that they will be able to resolve or narrow the current disputes regarding the document search methodology and search terms if given more time to meet and confer.

Plaintiffs and Triumph will work diligently to complete the meet-and-confer process relating to the Triumph document search methodology and search terms by February 5, 2021. The Parties shall submit a joint status letter by February 5, 2021 regarding any disputes on document search methodology and search terms that still remain at that point.

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